Thompson, Steve

From: Thompson, Steve
Sent: Thursday, September 07, 2017 8:08 AM
To: ramiro.garcia@tceq.texas.gov
Cc: Seager, Cheryl
Subject: FW: Arkema - Crosby 114 Draft
Attachments: 114 Information Request DRAFT 2a - Arkema Crosby.doc

For discussion this morning on our coordination call. Attached is a focused set of questions focused on the incident and the storage of peroxides. We are not wanting to overwhelm the facility with a large records request.

From: Stucky, Marie
Sent: Thursday, September 07, 2017 8:02 AM
To: Thompson, Steve <thompson.steve@epa.gov>; Murdock, James <Murdock.James@epa.gov>
Subject: Arkema - Crosby 114 Draft

INTERNAL DELIBERATI VE – DO NOT RELEASE – WORK PRODUCT

Questions from document:

III. QUESTIONS

1. Please provide a detailed description and timeline of the event. Include the best known start time and duration of the incident. The timeline should address in detail the following events as well as any other relevant points:
    a. Primary power failure.
    b. Use of backup power supply and subsequent failure.
    c. Use of liquid nitrogen and related equipment and subsequent failure.
    d. Removal of organic peroxides material to each of the nine refrigerated trailers, and which specific organic peroxides materials were placed in each trailer.
    e. Relocation of each of the nine refrigerated trailers.
    f. Failure of primary and backup refrigeration systems in trailers.
    g. Ignition and combustion of materials in trailers
    h. Controlled burn of certain trailers
    i. Other emergency response activities.
2. Please provide any documents associated with the identification of hazards posed by organic peroxides at your facility, operating procedures related to organic peroxides, and procedures related to flood, hurricane, loss of power, and emergency operations, and shutdown.
3. What are the names and Chemical Abstract Service (CAS) Numbers of the organic peroxides moved to the refrigerated trailers?
    a. How and where are organic peroxides normally stored at the facility?
    b. How much organic peroxides are stored at the facility at any one time?
    c. What layers of protection or other release prevention measures are in place for the storage of organic peroxides on site?
    d. Under what conditions are organic peroxides moved to refrigerated trailers? Prior to the incident, when and for how long have you stored organic peroxides in refrigerated trailers?
    e. Are organic peroxides ever moved off site for safe storage? If so, where are they moved, and what conditions trigger such movement?
4. What backup power and safety systems were in place prior to the flooding?

a. What "Recognized And Generally Accepted Good Engineering Practices" are followed by Arkema for the design, installation, operation, maintenance, and reliability of the backup power and safety system?
b. What were the engineering and administrative controls for the safety and power systems, and what were their known consequences of failure, and what additional safety measures were in place in event of such failure?

5. What measures did Arkema take in response to the flooding to minimize consequences of an accidental release or fire/explosion involving either RMP-regulated substances or other hazardous chemicals held at the site, including organic peroxides?

Sincerely,

Marie Stucky
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